

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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IN RE ADAMS GOLF SECURITIES	:	C.A. No. 99-371-KAJ
LITIGATION	:	(Consolidated)
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**PLAINTIFFS' NOTICE OF DEPOSITION(S)
OF CORPORATE DESIGNEE(S) PURSUANT TO FED. R. CIV. P. 30(b)(6)**

TO: ALL COUNSEL LISTED ON ATTACHED CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that in accordance with Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs, through their undersigned attorneys, will take the deposition upon oral examination of the following corporate Defendants at the law offices of Simpson, Thacher & Bartlett, LLP, located at 425 Lexington Avenue, New York, NY 10017, on the dates and times indicated below, or at such other times and places as counsel and the deponents may agree:

<u>Deponent</u>	<u>Date</u>	<u>Time</u>
Lehman Brothers Holdings Inc. by the person(s) most knowledgeable about the matters set forth on the attached Schedule A	October 4, 2005	9:30 a.m.
Ferris Baker Watts, Inc. by the person(s) most knowledgeable about the matters set forth on the attached Schedule A	October 5, 2005	9:30 a.m.

Banc of America Securities October 6, 2005 9:30 a.m.
By the person most
knowledgeable about the
matters set forth on the
attached Schedule A

The deposition(s) will be conducted before a notary public or other person duly authorized to administer oaths and take testimony, and may be recorded by stenographic or videographic means, for all purposes in this action, including trial. You are invited to attend and cross-examine.

In accordance with Federal Rule of Civil Procedure 30(b)(6), Defendants are hereby notified of their obligation to designate one or more officers, directors, or managing agents, employees or other persons who consent to testify on their behalf with respect to the matters set forth on the attached Schedule A. The person(s) so designated shall be required to testify as to each of those matters known or reasonably available to Defendant.

Dated: September 7, 2005

ROSENTHAL, MONHAIT, GROSS
& GODDESS, P.A.

LEAD COUNSEL
Todd Collins, Esq.
BERGER & MONTAGUE, P.C.
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By: /s/Carmella Keener
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Liaison Counsel for Plaintiffs

SCHEDULE "A"

MATTERS ON WHICH EXAMINATION IS REQUESTED

1. The due diligence review regarding: (1) Adams' Golf's (the "Company") operational strategy, financial history, and projections conducted with the Company's senior management on March 24, 1998; (2) the April 13, 1998 meeting between equity research analysts from the underwriter defendants and the Company's senior management; (3) financial due diligence teleconferences between the underwriter defendants and the Company on April 21, 1998 and April 27, 1998. Areas of inquiry will include preparation for the meetings, content of meetings (including specific discussions of margins, returns, risks, projections, Costco and gray marketing), subsequent follow-up to the meetings, and documents prepared for, distributed or created in connection with, or pertaining to the meeting.
2. The Company's retailers and distributors, including specific discussions of margins, returns, risks, gray marketing, Costco, and/or trans-shipping.
3. The Company's road show, including preparations for the road show and the staffing and content of road show presentations.
4. Whenever created, analyst reports and related materials, including materials referred to or consulted in connection with the preparation of analyst reports.
5. Quarterly and Annual Projected Income Statement Projections created by the underwriter defendants (see for example UND 01217, UND 00696).
6. The Company's June 8, 1998 press release.
7. Risk factors analyzed and cited by the underwriter defendants (see UND 00695, UND 01211-13).
8. Gray marketing affecting Adams Golf and/or its competitors.
9. Communications with Adams Golf management, employees, retailers and/or distributors.
10. The preparation of the Registration Statement and the Prospectus.
11. Communications with the SEC regarding the Initial Public Offering ("IPO").
12. Due diligence regarding the IPO.

CERTIFICATE OF SERVICE

I, Carmella P. Keener, hereby certify that on this 7th day of September, 2005, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following:

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Wilmington, DE. 19899

In addition, undersigned counsel has caused a copy of the foregoing document to be delivered to the below listed counsel via electronic mail:

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